

# **EXHIBIT 17**

1  
2 UNITED STATES DISTRICT COURT  
3 FOR THE SOUTHERN DISTRICT OF NEW YORK  
4 Case No. 7:17-cv-08943

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4 NATIONAL ASSOCIATION FOR THE ADVANCEMENT  
5 OF COLORED PEOPLE, SPRING VALLEY BRANCH,  
6 et al.,

Plaintiffs,

7 - against -

8 EAST RAMAPO CENTRAL SCHOOL DISTRICT, et  
9 al.,

10 Defendants.

-----x  
11  
12  
13 October 23, 2018  
14 8:11 a.m.  
15

16 CONTINUED DEPOSITION of JULIO  
17 CLERVEAUX, held at the offices of Morgan,  
18 Lewis & Bockius LLP, located at 101 Park  
19 Avenue, New York, New York 10178, before  
20 Anthony Giarro, a Registered Professional  
21 Reporter, a Certified Realtime Reporter and  
22 a Notary Public of the State of New York.  
23  
24  
25

1

2 J U L I O C L E R V E A U X, after  
3 having first been duly sworn by a Notary  
4 Public of the State of New York, was  
5 examined and testified as follows:

6 EXAMINATION BY

7 MS. KOLLM:

8 Q Good morning.

9 A Good morning.

10 Q My name is Clara Kollm. And  
11 I represent the East Ramapo Central  
12 School District in this litigation.

13 Will you please state your  
14 full name for the record?

15 A Julio Clearveaux.

16 Q Is your current address  
17 still 8 Wolfe Drive, Spring Valley, New  
18 York 10977?

19 A That's my home address. But  
20 I recently moved.

21 Q You recently moved?

22 A Yeah.

23 Q What is your new address?

24 A 32C Forest Drive,  
25 Garnerville.

1 JULIO CLERVEAUX

2 Q New York?

3 A Yes.

4 Q Is that within the East  
5 Ramapo Central School District?

6 A No.

7 Q When did you relocate?

8 A About a year ago.

9 Q About a year ago?

10 A Yeah.

11 Q So that's about  
12 October 2017?

13 A I think around September.

14 Q September 2017?

15 A Yeah.

16 Q Do you understand that  
17 you're here today pursuant to a Notice of  
18 Deposition to give testimony in a case  
19 captioned NAACP, Spring Valley versus  
20 East Ramapo Central School District?

21 A Yes.

22 Q And are you a named  
23 plaintiff in the case?

24 A Yes.

25 Q On what date did you first

1 JULIO CLERVEAUX

2 election for the school board. But I  
3 think I only vote for the 2013 one.

4 Q You only voted for the East  
5 Ramapo School Board elections in the 2013  
6 election?

7 A That's correct.

8 Q You did not vote in years  
9 2014, 2015, 2016 or 2017; is that right?

10 A For the school board, no.

11 Q Okay. Thank you.

12 Did any documents refresh  
13 your recollection about your voting  
14 history in the school board elections?

15 A No.

16 Q When did you remember that  
17 you did not vote in the 2014 through 2018  
18 elections?

19 A I think when I reviewed the  
20 last deposition or the last transcript,  
21 call them.

22 Q When did you review the  
23 transcript from your February 7th, 2018  
24 deposition?

25 A I don't remember the exact

1 JULIO CLERVEAUX

2 date.

3 Q Approximately is fine.

4 A Maybe within the past 30  
5 days.

6 Q Did you vote for the East  
7 Ramapo School Board elections in 2018?

8 A No.

9 Q Have you given testimony in  
10 a deposition other than your  
11 February 7th, 2018 deposition in this  
12 case?

13 A No.

14 Q You've never testified at  
15 trial; right?

16 A No.

17 Q No, you have never testified  
18 at trial?

19 A No.

20 Q So I know you've given a  
21 deposition previously. So I'll just go  
22 over the rules briefly. And if you have  
23 any questions, please let me know.

24 A All right.

25 Q I'm going to ask you some

1 JULIO CLERVEAUX

2 A I believe it was 2013.

3 Q And you voted in the 2013  
4 election for your brother?

5 A Yes.

6 Q Did you vote for any other  
7 candidate for the school board in the  
8 2013 election?

9 A Yes, I did.

10 Q Do you remember who you  
11 voted for in the 2013 school board  
12 election?

13 A I don't remember the name.  
14 But whoever was running with my brother,  
15 I voted for them.

16 Q What do you mean when you  
17 say "running with your brother"?

18 A He was running as a team.

19 Q He was running as a team?

20 A Yes.

21 Q What do you mean by that?

22 A A team, more than one people  
23 was running.

24 Q And do you remember who else  
25 was on his team?

1 JULIO CLERVEAUX

2 A I don't remember their name.

3 Q Do you remember how your  
4 brother chose the persons who would be on  
5 his team with him?

6 MS. PARVIS: Objection.

7 A No.

8 Q Were you involved in the  
9 process by which your brother chose his  
10 team for the election?

11 A No.

12 Q Was this litigation ongoing  
13 in 2013?

14 A I don't know.

15 Q You don't know?

16 A I don't know.

17 Q How did you become a  
18 plaintiff in this case?

19 MS. PARVIS: Objection.

20 Q Let me rephrase.

21 So you're a named plaintiff  
22 in this litigation; right?

23 A Correct.

24 Q In your own words, can you  
25 tell me what it means to be a named



1 JULIO CLERVEAUX

2 plaintiff in litigation?

3 A To be part of the process of  
4 -- to be part of the litigation process.

5 Q And what is your role in the  
6 litigation process?

7 A What you mentioning before,  
8 a plaintiff.

9 Q What does it mean to be a  
10 plaintiff?

11 MS. PARVIS: Objection.

12 Q You can answer.

13 A To be part of the  
14 litigation.

15 Q Who were you first  
16 approached by about potentially  
17 participating as a plaintiff in the  
18 litigation?

19 A Who ask me to be a  
20 plaintiff? Well, I made that decision  
21 myself to be a plaintiff. But I think I  
22 was talking to Steve White.

23 Q Who is Steve White?

24 A I know, or I think he's a  
25 resident of the East Ramapo School

1 JULIO CLERVEAUX

2 A Emma.

3 Q When did you first register  
4 to vote in the East Ramapo Central School  
5 District?

6 A I don't remember. But maybe  
7 2007, 2008. I don't remember.

8 Q And were you registered to  
9 vote in the district the entire time you  
10 lived at 8 Wolfe Drive?

11 A I'm still registered to vote  
12 there.

13 Q You're still registered to  
14 vote in the district, even though you've  
15 moved?

16 A I own a house there.

17 Q And you're still eligible to  
18 vote even though you've moved?

19 MS. PARVIS: Objection.

20 Q You can answer.

21 A I don't know. I don't  
22 change -- I never change. So I'm still  
23 registered to vote there.

24 Q What didn't you change?

25 A My voting registration.

1 JULIO CLERVEAUX

2 A The candidate have children?

3 No. That's not important.

4 Q You don't vote for  
5 candidates for the school board based on  
6 their race, do you?

7 A No.

8 MS. KOLLM: We can take a  
9 break.

10 (A short recess was taken.)

11 Q So, Mr. Clerveaux, you've  
12 made some clarifications to your  
13 declaration today; isn't that right?

14 A Yes.

15 Q When did you first realize  
16 your declaration required clarification?

17 A I don't remember when  
18 exactly.

19 Q It was after you reviewed  
20 your deposition transcript in this  
21 litigation; is that right?

22 A I think so. But I don't  
23 remember.

24 Q Did you tell anyone that  
25 your declaration required clarification?

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E X A M I N A T I O N

EXAMINATION

Ms. Kollm 43

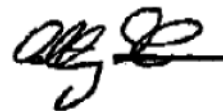
E X H I B I T S

J. Clerveaux	Description	Page
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C E R T I F I C A T I O N

I, ANTHONY GIARRO, a Shorthand  
Reporter and a Notary Public, do hereby  
certify that the foregoing witness, JULIO  
CLERVEAUX, was duly sworn on the date  
indicated, and that the foregoing, to the  
best of my ability, is a true and accurate  
transcription of my stenographic notes.

I further certify that I am not  
employed by nor related to any party to  
this action.



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ANTHONY GIARRO